



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MKM:MKP/TH/MJL/KMT  
F. #2017R01840

*271 Cadman Plaza East  
Brooklyn, New York 11201*

February 15, 2019

By Hand and ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

The Honorable Vera M. Scanlon  
United States Magistrate Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.  
Criminal Docket No. 18-204 (NGG) (S-1)

Dear Judge Garaufis and Judge Scanlon:

As directed by Judge Scanlon during the February 11, 2019 conference, the government respectfully submits this letter to inform the Court about a dispute between the government and the defendants regarding the timing of expert disclosures and to inform the Court of an agreed-upon briefing schedule for a motion defendants have indicated they intend to make.

The government has proposed that the government and defense counsel simultaneously disclose experts that they intend to rely upon in their cases-in-chief on February 25, 2019, and that any rebuttal experts or experts who are informed by the disclosure on February 25, 2019, be disclosed by March 8, 2019. Defense counsel consents to the February 25, 2019 date for disclosure of the government's experts, but believes that all defense experts should be disclosed on March 25, 2019.

The government respectfully submits that experts the defendants currently intend to rely upon should be disclosed on February 25, 2019 and that disclosure of defense experts on March 25, 2019 would not provide adequate time prior to trial to make any

appropriate motions regarding those experts. Defense counsel also seeks to be able to make additional expert disclosures based on the government's presentation of evidence at trial. The government objects to this request and believes it will potentially result in a substantial delay during the trial.

The government also informs the Court that defendants intend to make a discovery motion related to material seized from Nancy Salzman's residence.<sup>1</sup> Defendants have proposed making their motion on February 25, 2019, the government's opposition being due on March 4, 2019 and the defendants' reply being due on March 7, 2019. The government has no objection to the proposed schedule.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
Moira Kim Penza  
Tanya Hajjar  
Mark J. Lesko  
Kevin M. Trowel  
Assistant U.S. Attorneys  
(718) 254-7000

cc: Clerk of Court (NGG) (by ECF)  
Counsel of Record (by ECF)

---

<sup>1</sup> This is separate from the proposed motion discussed in Dkt. 346, filed earlier this evening.